

DAVID R. JOHANSON (SBN 164141)  
david.johanson@jacksonlewis.com  
JACKSON LEWIS LLP  
725 South Figueroa Street, Suite 2500  
Los Angeles, California 90017-5408  
Telephone: (213) 689-0404  
Facsimile: (213) 689-0430

CHARLES F. SEEMANN III (admitted *pro hac vice*)  
charles.seemann@jacksonlewis.com  
JACKSON LEWIS LLP  
650 Poydras Street, Suite 1900  
New Orleans, Louisiana 70130  
Telephone: (504) 208-1755  
Facsimile: (504) 208-1755

Attorneys for Defendants SOL HEALTHCARE, LLC; SOLNUS TWO, LLC; SOLNUS THREE, LLC; SOLNUS FOUR, LLC; SOLNUS EIGHT, LLC; SOL MAJER; and SCHLOMO RECHNITZ

UNITED STATES DISTRICT COURT

**NORTHERN DISTRICT OF CALIFORNIA**

SERVICE EMPLOYEES INTERNATIONAL ) Case No.: CV 12 4494 JST  
UNION NATIONAL INDUSTRY PENSION )  
FUND; STEPHEN ABRECHT, Trustee, ROD )  
BASHIR, Trustee; KEVIN J. DOYLE, Trustee; )  
MYRIAM ESCAMILLA, Trustee; STEVEN W. )  
FORD, Trustee; EDWARD J. MANKO, )  
Trustee; FRANK A. MAXSON, Trustee; JOHN )  
J SHERIDAN, Trustee; LARRY T. SMITH, )  
Trustee; DAVID STILWELL, Trustee, )  
Plaintiff, )  
vs. )  
EMPLOYEE EQUITY ADMINISTRATION, )  
INC., a California corporation, d/b/a Westline )  
Medical Management, et al. )  
Defendants. )

**JOINT STIPULATION TO CONTINUE  
CASE MANAGEMENT  
CONFERENCE; and [PROPOSED] ORDER**

Date: July 3, 2013  
Time: 2:00 p.m.  
Judge: Hon. Jon S. Tigar  
Location: Courtroom 9, 19<sup>th</sup> Floor  
450 Golden Gate Ave.  
San Francisco, California

**First Amended  
Complaint filed: May 16, 2013  
Trial Date: June 30, 2014**

1 Plaintiffs Service Employees International Union National Industry Pension Fund, Stephen  
2 Abrecht, Rod Bashir, Kevin J. Doyle, Myriam Escamilla, Steven W. Ford, Edward J. Manko, Frank A.  
3 Maxson, John J. Sheridan, Larry T. Smith, and David Stillwell (collectively, the “Plaintiffs”), the  
4 Westline Defendants (which includes Defendants Employee Equity Administration, Inc., Oak Facility,  
5 Inc., RCC Facility, Inc., RV Facility, Inc., SP Facility, Inc., SJ Facility, Inc., Pleasant View  
6 Convalescent Hospital, Inc., Willow Street Properties, LLC, Northgate Center, Inc., Jaline, Inc., Skilled  
7 Logic Systems, Jack Easterday, and Deline Davis), and the Solnus Defendants (which include Sol  
8 Healthcare, LLC, SOLNUS TWO, LLC, SOLNUS THREE, LLC, SOLNUS FOUR, LLC, SOLNUS  
9 EIGHT, LLC, Sol Majer, and Shlomo Rechnitz), (collectively, the “Parties”), hereby stipulate as  
10 follows:

11 1. A Case Management Conference is currently scheduled for July 3, 2013, per Docket No.  
12 32.

13 2. On June 18, 2013, counsel for the Solnus Defendants became aware that he no longer was  
14 available on July 3, 2013, for the Case Management Conference due to personal reasons involving  
15 ongoing medical care for a family member.

16 3. The Parties jointly request that the Case Management Conference be continued to the next  
17 available date for the Parties, which is August 28, 2013, or as soon thereafter when the court is next  
18 available.

19 4. The Parties request that the Joint Case Management Conference Statement be submitted to  
20 the Court ten court days before August 28, 2013.

21 IT IS SO STIPULATED.

22 Date: June 19, 2013 JACKSON LEWIS LLP

23 By: \_\_\_\_\_ /S/  
24

25 DAVID R. JOHANSON  
26  
27 Attorneys for Defendants Sol Healthcare LLC,  
Solnus Two, LLC; Solnus Three, LLC;  
Solnus Four, LLC; Solnus Eight, LLC; Sol Majer; and  
Shlomo Rechnitz  
28

1 Date: June 19, 2013

SALTZMAN & JOHNSON LAW CORPORATION

4 By: \_\_\_\_\_ /S/

5 ANNE M. BEVINGTON

6 Attorneys for Plaintiffs

7 Date: June \_\_\_, 2013

8 By: \_\_\_\_\_

9 SHELLEY R. BUCHANAN

10 Attorneys for Defendants Employee Equity  
11 Administration, Inc., et al.

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14

15 **[PROPOSED] ORDER**

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17 The terms of the Stipulation herein above are hereby approved and adopted.

18 The Case Management Conference currently scheduled for July 3, 2013, is hereby continued to

19 September 4 \_\_\_\_\_, 2013, at 2:00 p.m. The Parties shall file with the Court a Joint Statement ten (10)

20 court days prior to that date. IT IS SO ORDERED.

21 June 20 \_\_\_\_\_, 2013

22   
District Court Judge Jon S. Tigar